

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

FORD MOTOR CREDIT COMPANY LLC,)
)
)
Plaintiff,)
)
vs.)
) Case No.: 1:19-CV-00502-HAB-SLC
)
FINCANNON FORD, INC., f/k/a)
FINCANNON FORD-MERCURY, INC.,)
LINDA MUGHMAW, a/k/a)
LINDA FINCANNON,)
MATTHEW FINCANNON, and)
STANLEY BOURFF,)
)
Defendants.)

**DECLARATION OF CRAIG A. LESLIE IN SUPPORT OF THE APPLICATION
FOR ENTRY OF DEFAULT**

CRAIG A. LESLIE, ESQ., declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted *pro hac vice* to practice before this Court and a partner at Phillips Lytle LLP, attorneys for Plaintiff Ford Motor Credit Company LLC (“Ford Credit”). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. On August 5, 2020, Ford Credit filed a Second Amended Complaint against Defendants Fincannon Ford, Inc., f/k/a Fincannon Ford-Mercury, Inc. (“Fincannon Ford”), Linda Mughmaw, a/k/a Linda Fincannon (“Ms. Mughmaw”), Matthew Fincannon (“Mr. Fincannon”), and Stanley Bourff (“Mr. Bourff”). *See* Second Amended Compl., ECF No. 54.

3. The Clerk of the Court issued summonses as to Mr. Fincannon and Mr. Bourff on August 7, 2020. *See* Summons Issued, ECF No. 55.

4. On August 15, 2020, Mr. Fincannon was served with the Summons and Second Amended Complaint. *See* Summons Returned Executed, ECF No. 57.

5. The same day, Mr. Bourff was served with the Summons and Second Amended Complaint. *See* Summons Returned Executed, ECF No. 58.

6. Mr. Fincannon and Mr. Bourff were required to answer or otherwise respond to the Second Amended Complaint on or before September 8, 2020 and have not done so. *See* Fed. R. Civ. P. 12(a).

7. Upon information and belief, Mr. Fincannon and Mr. Bourff are not infants, incompetent or currently serving in the military.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of September, 2020.

/s/ Craig A. Leslie

Craig A. Leslie, Esq. (Pro Hac Vice)
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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2020, a copy of the foregoing was filed electronically and served via the Court's CM/ECF system on the following counsel of record:

J. Curtis Greene
Jonathan David Sundheimer
Barnes & Thornburg LLP
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*Attorneys for Defendants Fincannon Ford Inc. f/k/a
Fincannon Ford-Mercury, Inc. & Linda Mughmaw
a/k/a Linda Fincannon*

I hereby certify that on September 15, 2020, a copy of the foregoing was mailed via U.S. mail to the following:

Matthew Fincannon
8897 E N 0 S (IN-18)
Marion, Indiana 46952

Stanley Bourff
2925 W. State Road 26
Hartford City, Indiana 47348

/s/ Craig A. Leslie